

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

IN RE: OUTSIDEWALL TIRE LITIGATION

C.A. No. 1:09-cv-1217-TSE-IDD

**MOTION TO DETERMINE VALUE OF GILBERT LLP'S
LIEN FOR ATTORNEY'S FEES AND COSTS**

Judgment Creditors Tire Engineering and Distribution L.L.C., Jordan Fishman, Bearcat Tire A.R.L., and Bcatco A.R.L. ("Judgment Creditors") by and through the undersigned counsel, respectfully request that this Court determine the value of Gilbert LLP's lien for attorney's fees and costs in the above referenced matter. The grounds for this motion are set forth in the accompanying memorandum.

WHEREFORE, Judgment Creditors respectfully request that this Court grant its Motion to Determine Value of Gilbert LLP's Lien for Attorney's Fees and Costs. A proposed Order is attached.

Respectfully submitted

Dated November 22, 2013

/s/
William E. Copley
Virginia Bar No. 43960
August J. Matteis (admitted *pro hac vice*)
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CERTIFICATE OF SERVICE

I, William E. Copley, certify that on November 22, 2013, I caused a true and accurate copy of the foregoing Motion to Determine Value of Gilbert LLP's Lien for Attorney's Fees and Costs to be delivered to the following interested party, Gilbert LLP via electronic filing:

Barry Ira Buchman
GILBERT LLP
1100 New York Ave NW
Suite 700
Washington, DC 20005
Email: buchmanb@gotofirm.com

In addition, I caused a true and accurate copy of the foregoing to be served by hand upon counsel for Gilbert LLP at the following address:

Allen Gardner
LATHAM & WATKINS LLP
555 Eleventh Street NW, Suite 1000
Washington, DC 20004

/s/
William E. Copley
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